To: Scott Kluska[skluska@cteh.com]; stillots@nd.gov[stillots@nd.gov]; Peronard, Paul[Peronard.Paul@epa.gov]; Rockeman, Karl H.[krockema@nd.gov]; dglatt@nd.gov[dglatt@nd.gov]
Cc: cmckissack@garner-es.com[cmckissack@garner-es.com]; Casey Anderson (canderson@garner-es.com)[canderson@garner-es.com]; MikeC@redriversupply.us[MikeC@redriversupply.us]
From: Roberts, Kris D.
Sent: Thur 8/28/2014 12:46:20 PM
Subject: RE: Red River Supply - Concrete

Scott and Mike:

I looked over what you have on the concrete recycling. Sorry, but from the map you submitted, there is no way we can approve using that concrete in the location suggested. Those numbers for DRO and ORO are way too high, and you are not using the concrete as road base as you we thought. In addition, the location is darn near directly adjacent to open water.

Please work with Steve Tillotson and Karl Rockeman for anything further on this recycle/reuse issue. Road base, high and dry railroad spur ballast may be possible, but placing anything with this kind of analysis down near a water course is just out of the question.

Kris Roberts

Environmental Response Team Leader

ND Department of Health

Division of Water Quality

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From: Scott Kluska [mailto:skluska@cteh.com]
Sent: Wednesday, August 27, 2014 7:48 PM
To: Roberts, Kris D.; Tillotson, Steve J.; Peronard.Paul@EPA.Gov
Cc: cmckissack@garner-es.com; Casey Anderson (canderson@garner-es.com); MikeC@redriversupply.us
Subject: Red River Supply - Concrete

Steve,

Per a discussion that Mike Crocker and I had with Kris Robertson this afternoon regarding the re-purposing of the concrete, I am following up with some additional details on the current status, sample analyses and the proposed re-purpose location on Red River Supply property.

Current Status

There are currently 3 stockpiles of mainly concrete with and without rebar currently staged at the fire site. They are Piles 10, 11 and 12. Pile # 13 contains a mix of concrete and soil that was directly under the concrete that was collected when the smaller pieces of concrete were collected. Please see the attached diagram that depicts the stockpiles and their #'s.

Sampling & Analyses

As with all of the solid waste streams, CTEH collected samples of the material and submitted it for waste characterization (Toxicity Characteristic Leachate Procedure (TCLP) including TCLP SVOCs EPA Method 8260, TCLP VOCs EPA Method 8270, TCLP Metals EPA 610, and Reactivity, Corrosivity and Ignitability (RCI) EPA 9045 and 1010). Composite samples were collected based on approximately one (1) per every 150 cyds of material. Each composite sample was comprised of 15 individual grab samples that were combined and homogenized. It should be noted that the surfaces of the concrete that were sampled were based on the areas that were potentially impacted whether by the fire or runoff of fire water/product. Therefore concrete

chip samples were collected from the top surfaces and underside of the concrete slab pieces. As you know this could present the worst case scenario of any potential impact of the concrete. These thin layers of the concrete slabs that ranged in thickness from 4" to 8" that were stained could represent <0.1% of the total volume of concrete currently staged onsite awaiting to be potentially re-purposed. The remaining 99.9% is the solid non-impacted layer in-between. Attached are preliminary lab reports of the samples collected (final reports of all analyses are expected tomorrow, Thursday). As you will see there are samples with elevated Petroleum Hydrocarbons (DRO/ORO/GRO), but we feel the volume of actual impacted concrete is extremely minimal.

Please note that Stockpile 13 (with sample ID's of 0817WP13A, 0817WP13B, 0817WP13C and 0817WP13D) contains a mixture of concrete and soil and it is intended to be shipped to Clean Harbors Sawyer for disposal. This pile is not intended for re-purposing.

Concrete Re-purposing Location

As previously mentioned, Red River Supply would like to utilize or re-purpose the concrete debris on the Red River Supply – East Rail Yard located at 13315 50th Rd. NW, Williston, ND, 58801. This site is immediately to the East of the Red River Supply fire site. From site entrance to site entrance it is approximately 1 mile away. The proposed plan is to take the concrete to this Red River Supply rail yard and place it in an area for surface stabilization. One the concrete is spread out and crushed/compacted in-place, there will be additional stabilizing layers placed over the top of the concrete. i.e., soil, stone, asphalt, etc. The area will then be utilized for truck and or equipment parking and staging. Attached is a diagram showing where on the Red River Supply – East Rail Yard the concrete is proposed to be placed and utilized. As you can see this is a large site and currently an industrial setting / use.

Based on the lab results, the % of concrete that is actually impacted and the intend use. Red River Supply feels that by re-purposing the concrete in this manner, there is little to no potential adverse impact to the environment. This will also A.) reduce the # of trucks having to travel a longer distance to a landfill, B.) act as a recycling option and reduce the amount of waste going into landfills, and C.) reduce the overall costs of this incident that has adversely impacted Red River Supply.

You immediate consideration and reply/approval would be greatly appreciated in this matter. If you have any questions, or need additional information, please do not hesitate to ask.

Thanks again.

Scott Kluska

Sr. Consultant

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